

The Honorable Lauren King
The Honorable Brian A. Tsuchida

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware
corporation; AMAZON.COM SERVICES LLC,
a Delaware limited liability company; and THE
THOUGHT & EXPRESSION CO., INC., a
Virginia corporation,

Plaintiffs,

v.

AMANDEEP SINGH, an individual; and
BHUSHAN KUMAR, an individual; and DOES
1-10,

Defendants.

No. 2:24-cv-01464-LK-BAT

**MOTION FOR ENTRY OF DEFAULT
AGAINST DEFENDANTS AMANDEEP
SINGH AND BHUSHAN KUMAR**

WITHOUT ORAL ARGUMENT

NOTE ON MOTION CALENDAR:
NOVEMBER 21, 2024

Plaintiffs Amazon.com, Inc., Amazon.com Services LLC, and The Thought &
Expression Co. d/b/a Thought Catalog (“Plaintiffs”) move, pursuant to Federal Rule of Civil
Procedure 55(a) and Local Civil Rule 55(a), for entry of default against Defendants Amandeep
Singh and Bhushan Kumar (“Defendants”).

On September 13, 2024, Plaintiffs filed a Complaint against Defendants who advertised
and sold infringing Thought Catalog-branded books in the Amazon.com store. Dkt. 1.

On October 24, 2024, Plaintiffs filed a Motion for Alternative Service, seeking an order
allowing service upon Defendants through the email addresses used to register the Selling
Accounts under their control and the email addresses Defendants used to register financial

1 accounts linked to their Selling Accounts. *See, generally*, Dkt. 16. The Court granted the Motion
 2 (Dkt. 19) and Plaintiffs successfully served Defendants via email on October 25, 2024. *See*
 3 Certificate of Service, Dkt. 20. Defendants' responsive pleadings were due on or before
 4 November 15, 2024. Fed. R. Civ. P. 12(a)(1)(A)(i).

5 Defendants did not respond to the emails through which Plaintiffs served them with
 6 process, have not since appeared in this action personally or through counsel, have not filed or
 7 served an answer in this action during the time provided by Rule 12 of the Federal Rules of Civil
 8 Procedure, and have not otherwise indicated any intent to participate in this litigation. Fed. R.
 9 Civ. P. 12(a)(1)(A)(i). Accordingly, Plaintiffs respectfully request that the Court enter an order
 10 of default against Defendants.

11
 12 *I certify that this memorandum contains 236 words, in compliance with the Local Civil*
 13 *Rules.*

14
 15 DATED this 21st day of November, 2024.

16 DAVIS WRIGHT TREMAINE LLP
 17 Attorneys for Plaintiffs

18 s/ Scott R. Commerson

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**[PROPOSED] CLERK'S ORDER
GRANTING MOTION FOR ENTRY
OF DEFAULT AGAINST
DEFENDANTS AMANDEEP SINGH
AND BHUSHAN KUMAR**

THIS MATTER came before the Court on Plaintiffs Amazon.com, Inc., Amazon.com Services LLC, and The Thought & Expression Co. d/b/a Thought Catalog's Motion for Entry of Default (the "Motion") against Defendants Amandeep Singh and Bhushan Kumar (collectively, "Defendants").

The Court, having considered the Motion, the governing law, and being fully advised, finds that Defendants have not filed a responsive pleading to the Complaint (Dkt. 1), which they were required to do by November 15, 2024, in accordance with Federal Rule of Civil Procedure 12(a)(1)(A)(i).

1 Accordingly, it is hereby ORDERED that Defendants Amandeep Singh and Bhushan
2 Kumar are in default.

3
4 SO ORDERED this _____ day of _____, 2024.

5
6
7 _____
CLERK OF COURT

8
9 Presented by:

10 DAVIS WRIGHT TREMAINE LLP
11 *Attorneys for Plaintiffs*

12 s/ Scott Commerson

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